

Geoffrey Harper, Esq. (*Pro Hac Vice*)
Beth Jaynes, Esq. (*Pro Hac Vice*)
Kelly Vickers, Esq. (*Pro Hac Vice*)
FISH & RICHARDSON, P.C.
5000 Bank One Center
1717 Main Street
Dallas, TX 75201
Telephone: 214 747-5070
Facsimile: 214 747-2091

Autumn Hwang, Esq. (AH 5164)
FISH & RICHARDSON, P.C.
45 Rockefeller Plaza, Suite 2800
New York, NY 10111
Telephone: 212 765-5070
Facsimile: 212 258-2291

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**SR INTERNATIONAL BUSINESS
INSURANCE COMPANY,**

Plaintiff

v.

Case No.: 04 Civ 04567 (DLC) (ECF Case)

**MCI, INC., BERNARD EBBERS, SCOTT D.
SULLIVAN, BETTY L. VINSON, TROY M.
NORMAND, BUFORD YATES, JR., SUSAN
G. BELL, CLIFFORD ALEXANDER, JR.,
JAMES C. ALLEN, JUDITH AREEN, CARL
J. AYCOCK, RONALD R. BEAUMONT,
FRANCESCO GALESI, STILES A.
KELLETT, JR., GORDON S. MACKLIN,
DAVID F. MYERS, JOHN A. PORTER,
BERT C. ROBERTS, JR., ESTATE OF
JOHN W. SIDGMORE, LAWRENCE A.
TUCKER, JUAN VILLALONGA, MAX E.
BOBBITT, AND JOHN DOES 1-50,**

Defendants


**DEFENDANT FRANCESCO GALESI'S JOINDER AND ADOPTION
OF THE MOTION OF BERT C. ROBERTS, JR. TO DISMISS**

Defendant Francesco Galesi, by and through their undersigned counsel, hereby join and adopt the Defendant Bert C. Roberts, Jr.'s Motion to Dismiss This Action for Lack of Subject Matter Jurisdiction, Pursuant to F.R.Civ.P. 12(h)(3) and memorandum in support thereof, filed on July 7, 2004 and Defendant Bert C. Roberts, Jr.'s Reply Memorandum on His Motion to Dismiss This Action for lack of Subject Matter Jurisdiction, Pursuant to F.R.Civ.P. 12(h)(3), filed on July 27, 2004.

Respectfully submitted,

FISH & RICHARDSON P.C.

Dated: August 13, 2004


By: Autumn J.S. Hwang (AH 5164)
45 Rockefeller Plaza, Suite 2800
New York, NY 10111
Telephone: 212 765-5070
Facsimile: 212 258-2291

Geoffrey Harper, Esq. (*Pro Hac Vice*)
Beth Jaynes, Esq. (*Pro Hac Vice*)
Kelly Vickers, Esq. (*Pro Hac Vice*)
FISH & RICHARDSON, P.C.
5000 Bank One Center
1717 Main Street
Dallas, TX 75201
Telephone: 214 747-5070
Facsimile: 214 747-2091

Attorneys for Defendant
FRANCESCO GALESİ